

**Ashley M. Gjovik, JD**  
*In Propria Persona*  
2108 N St. Ste. 4553  
Sacramento, CA, 95816  
(408) 883-4428  
legal@ashleygjovik.com

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

**Case No. 3:23-CV-04597-EMC**

**[PROPOSED] ORDER**

**ASHLEY GJOVIK**, *an individual*,

Plaintiff,

v.

**APPLE INC**, *a corporation*,

Defendant.

**[PROPOSED] ORDER**

1. Plaintiff Ashley M. Gjøvik has moved to quash Defendant Apple Inc.'s May 13, 2025 joint discovery letter seeking entry of a protective order and to stay discovery pending the resolution of Plaintiff's appeal and related Rule 8 motion for injunction currently pending before the United States Court of Appeals for the Ninth Circuit (Case No. 25-2028).

2. Having reviewed the motion and accompanying materials, and for good cause shown, the Court hereby ORDERS as follows:

3. Jurisdictional Stay of Discovery: All discovery proceedings and associated matters currently referred to the assigned magistrate judge are hereby **STAYED** pending resolution of Plaintiff's appeal and motion for injunction in the Ninth Circuit (Case No. 25-2028). This includes any requests for protective orders, document designations, or deposition-related relief that implicate matters pending appellate review or overlap with issues raised in Plaintiff's ongoing NLRB proceedings.

4. Quashing of May 13, 2025 Joint Letter: The Court **QUASHES** Defendant's May 13, 2025 joint discovery letter seeking a protective order and finds that under the current procedural posture, such relief must be sought, if at all, by renewed motion, with full briefing, after the jurisdictional stay is lifted.

5. Clarification of Magistrate Referral: The Court's prior referral of discovery matters to the magistrate judge (Dkt. 83) is hereby suspended for the duration of this stay. No discovery rulings, including protective orders, shall be issued under this referral until jurisdiction is restored and full briefing is permitted consistent with due process and FRCP 26(c).

6. Preservation of Rights and Objections: This Order shall not be construed to waive or limit any party's objections, statutory rights, or constitutional defenses.

7. The Court reserves jurisdiction to consider such matters once appellate jurisdiction concludes.

IT IS SO ORDERED.

DATED: [To Be Entered]

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**Hon. Edward M. Chen**

**United States District Judge**